

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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August 28, 2020


VIA ECF

Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Defense counsel's request to provide materials to the Court is granted. Counsel is directed to deliver the documents on a flash drive to chambers on Monday, August 31, 2020 or Tuesday, September 1, 2020.

8/31/2020

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

**Re: United States v. Lawrence Ray
20 Cr. 110 (LJL)**

Dear Judge Liman:

We write as defense counsel for Lawrence Ray in response to the Court's orders on August 27, 2020. Doc. 41, 44.

Mr. Ray's August 11, 2020 motion for bail and modest discovery accommodations requests as relief, in part, that the Court modify the protective order in this case. To be clear, the defense's motion did not request that the Court immediately review any discovery materials in this matter. Rather, the defense's proposed modification simply provides a mechanism for the Court to resolve discovery disputes as they arise in an effort to maximize Mr. Ray's access to the discovery in his own case. Given that the Government will provide the Court with examples, under seal, of disclosure materials bearing the "sensitive" designation, the defense requests the opportunity to do the same. In anticipation of providing such materials to the Court, the defense would appreciate guidance from the Court about the manner in which the Court would like to receive the materials. The defense will also provide the Government with a copy of these materials.

Respectfully submitted,

/s/ Marne L. Lenox

Marne L. Lenox, Esq.
Peggy Cross-Goldenberg, Esq.
Neil P. Kelly, Esq.

Counsel for Lawrence Ray

Hon. Lewis J. Liman

cc: AUSA Danielle R. Sassoon, Esq.
AUSA Lindsey Keenan, Esq.
AUSA Mollie Bracewell, Esq.